

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

JAGUAR CARS, A Division of the Ford )  
Motor Company, )  
 )  
Plaintiff, )  
 )  
v. )  
 )  
LEE IMPORTED CARS, INC., )  
 )  
Defendant/Third-Party Plaintiff, )  
 )  
v. )  
 )  
JOHN DOE, )  
 )  
Being the Fictitious Name of )  
Third-Party Defendant. )  
 )

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Civ. No. 03CV12532RGS

**JOINT STATEMENT PURSUANT TO LOCAL RULE 16.1**

Pursuant to Local Rule 16.1, Plaintiff Jaguar Cars (“Jaguar”) and Defendant Lee Imported Cars, Inc. (“Lee”), having conferred as required by Local Rule 16.1(B), hereby submit the following Local Rule 16.1(D) Joint Statement.

**I. AGENDA FOR SCHEDULING CONFERENCE**

The parties propose that the pre-trial matters set forth in Section III below be discussed during the scheduling conference.

**II. INITIAL DISCLOSURE - RULE 26(a)(1) and LOCAL RULE 26.2**

The parties have agreed that they will exchange required automatic disclosures pursuant to Fed. R. Civ. P. 26(a)(1) on or before April 30, 2004. At this stage, the parties believe that the

number and type of discovery events set forth in Local Rule 26.1(C) are appropriate. This does not appear to be a case which would benefit from phased discovery.

### **III. PROPOSED PRE-TRIAL SCHEDULE**

A proposed pre-trial schedule, including a joint discovery plan and proposed schedule for the filing of motions, is as follows:

EVENT	DATE
Fact discovery completed by:	December 14, 2004
Expert disclosures shall be made as required by Rule 26(a)(2) and Local Rules 16.5(C) and 26.4(A) by:	January 31, 2005
Rebuttal expert disclosures shall be made by:	February 28, 2005
Expert discovery to be completed by:	April 15, 2005
All dispositive motions, including those pursuant to Fed. R. Civ. P. 56, filed by:	May 16, 2005

The parties will be prepared for a final pretrial conference at a date convenient for the Court. All dates set forth herein may be modified by written agreement of the parties and approval of the Court, or upon motion to the Court for good cause shown.

### **IV. MAGISTRATE JUDGE**

The parties do not consent to trial by magistrate judge at this time.

### **V. SETTLEMENT**

On February 27, 2004, Jaguar, through its counsel, made a written settlement proposal.

### **VI. LOCAL RULE 16.1(D)(3) CERTIFICATIONS**

The Local Rule 16.1(D)(3) Certifications will be filed by the parties under separate cover.

JAGUAR CARS, A DIVISION OF THE  
FORD MOTOR COMPANY,

By its attorneys,



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LEE IMPORTED CARS, INC.,  
By its attorneys,



Jason A. Manekas, Esq. (BBO # 632073)  
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Dated: March 2, 2004

**CERTIFICATE OF SERVICE**

I hereby certify that on this day a true copy of the  
above document was served upon the attorney of  
record for each party by mail/by hand.

Dated: 3/3/04 SKZM